

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**JOINT MOTION TO EXTEND MEDIATION
AND PRE-TRIAL ORDER DEADLINES**

COME NOW, Plaintiff Robert Dedmon and Defendants Shell Exploration & Production Company and Shell Trading Services Company, by and through their undersigned counsel, and file this Joint Motion to Extend Mediation and Joint Pretrial Order deadlines. In support of this motion, the parties would show this Court the following:

1. On October 23, 2024, Plaintiff filed an unopposed motion to extend his deadline to respond to Defendants' Motion for Summary Judgment. (Dkt No. 37). The Court granted Plaintiff's motion on October 29, 2024, giving Plaintiff until November 7, 2024 to file his response. (Dkt. No. 38).

2. Plaintiff's response to Defendant's motion now falls after the Parties' deadline to mediate the case, which is November 1, 2024. The Parties believe that it will be beneficial to settlement efforts to have full briefing on the issues before they attend

mediation. The Parties have conferred and have agreed to mediate the case with Gloria Portela on November 19, 2024 (subject to resolution of an existing conflict) or with another agreeable mediator by November 29, 2024. Accordingly, the Parties respectfully request that the Court extend the mediation deadline to allow them this additional time to complete mediation.

3. Additionally, the Joint Pretrial Order is currently due on November 15, 2024, before the Parties are able to mediate the case. It is possible that the Parties will resolve this matter at mediation, which would make pretrial filings unnecessary. Therefore, to conserve resources for the Court and the Parties, Plaintiff and Defendants respectfully request that the Court extend the Joint Pretrial Order deadline to December 6, 2024, which is 10 days before docket call.

4. This request is not made for purposes of delay but rather to promote judicial economy by allowing the Parties sufficient time to work towards a possible resolution and, if necessary, complete the pretrial filings. Accordingly, the Parties jointly request extensions as follows:

Mediation or Settlement Conference Before the Magistrate Judge:	November 29, 2024
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Joint Pretrial Order:	December 6, 2024
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WHEREFORE, PREMISES CONSIDERED, Plaintiff and Defendants respectfully request that the Court grant this Motion as requested.

Respectfully submitted,

/s/ Amy Gibson by permission MCW

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CERTIFICATE OF SERVICE

The undersigned certifies that, on November 1, 2024, she filed the foregoing *joint motion* with the United States District Court for the Southern District of Texas through the CM/ECF system, such that Plaintiff should be served with a copy of the filed document through his counsel of record.

/s/ Marlene C. Williams

Marlene C. Williams